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13 Storage Technologies, Inc.

14  
15 UNITED STATES DISTRICT COURT

16 NORTHERN DISTRICT OF CALIFORNIA

17 SAN FRANCISCO DIVISION

18 DEREK SUZUKI, on Behalf of Himself,  
19 and All Others Similarly Situated,

Plaintiff,

20 vs.

21 HITACHI GLOBAL STORAGE  
22 TECHNOLOGIES, INC., and DOES 1-  
23 100, inclusive,

Defendants.

CASE NO. C 06-07289MHP

CLASS ACTION

STIPULATION AND ~~[PROPOSED]~~  
ORDER RE: MEDIATION CUTOFF  
DATE

1 WHEREAS, by order dated March 29, 2007, the Court set September 28,  
2 2007 as the deadline for completion of mediation before a private mediator;

3 WHEREAS, following the Court's Order on Defendant's Motion to Dismiss  
4 and Motion to Strike, the parties engaged in settlement discussions;

5 WHEREAS, while the parties believe those discussions have been  
6 productive, they have been unable to resolve this matter in those informal settlement  
7 discussions and agreed to mediate before the Hon. Edward A. Infante (Ret.);

8 WHEREAS, the parties contacted JAMS and were informed that Judge  
9 Infante's first available date for mediation was October 17, 2007;

10 IT IS HEREBY STIPULATED AND AGREED, by and between the parties  
11 hereto, through their respective counsel of record, that this matter shall be mediated before  
12 Judge Infante on October 17, 2007. By this stipulation, the parties respectfully request that  
13 the Court extend the time for mediation in this matter to permit the parties to mediate  
14 before Judge Infante.

15  
16 DATED: September 18, 2007

QUINN EMANUEL URQUHART OLIVER &  
HEDGES, LLP  
Shon Morgan  
Scott L. Watson

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19  
20 By /s/ Scott L. Watson  
21 Scott L. Watson  
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27 Storage Technologies, Inc.  
28

Attorneys for Plaintiff Derek Suzuki  
and the Proposed Class

**[PROPOSED] ORDER**

The parties shall have until October 31, 2007 to complete mediation of this action.

DATED: September 19, 2007

